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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

| | | |
|---------------------------|---|------------------------------|
| RAHINAH IBRAHIM, |) | No. 3:06-cv-00545 (WHA) |
| |) | |
| Plaintiff, |) | STIPULATION REQUESTING ORDER |
| |) | TO CHANGE DATE OF CASE |
| v. |) | MANAGEMENT CONFERENCE AND |
| |) | PROPOSED ORDER |
| DEPARTMENT OF HOMELAND |) | |
| SECURITY, <u>et al.</u> , |) | [CIVIL L.R. 6-1(a), 7-12] |
| |) | |
| |) | Hon. William H. Alsup |
| |) | |

Pursuant to Local Rule 6-1(a) and 7-12, the parties hereby submit this stipulated request for an order to change the date of the case management conference scheduled for February 12, 2008.

RECITALS

1. On December 24, 2009, the Ninth Circuit issued its mandate returning this case to this Court.
2. By Notice, dated January 28, 2009, Dkt. 149, a case management conference was scheduled for February 12, 2009.
3. The parties jointly request that they be afforded additional time to file a joint case management statement, and that the case management conference currently scheduled for February 12, 2009 be continued for a month. The parties request this additional time to consider jointly how best to advance these proceedings. If granted, the parties would submit a joint case management conference statement seven days prior to the date of the conference.

4. This is the parties' first request to change the date of the case management conference. Granting this request would not alter any other dates established in these proceedings.

5. Government counsel will be traveling to Riverside, California for oral argument in the Central District of California on March 9, 2009, and would request that the conference be rescheduled for the next day, March 10, 2009, if that date is available on the Court's calendar. Government counsel has conferred with counsel for the other parties, and counsel are all available on that date.

STIPULATION

Pursuant to Local Rule 6.1(a) and 7-12, the parties hereby jointly request an order changing the date of the case management conference, and that the conference be rescheduled for March 10, 2009, if that date is available on the Court's calendar.

Dated: February 2, 2009

Respectfully Submitted,

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Attorneys for the Federal Defendants

DECLARATION PURSUANT TO GENERAL ORDER 45, § X.B.

I, PAUL G. FREEBORNE, hereby declare pursuant to General Order 45, § X.B., that I have obtained the concurrence in the filing of this document from each of the other signatories listed below.

I declare under penalty of perjury that the foregoing declaration is true and correct.

Executed on February 2, 2009, in the City of Washington, District of Columbia.

/s/ Paul G. Freeborne
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PROPOSED ORDER

It is hereby **ORDERED** that the case management conference scheduled for February 12, March 12, 2009, at 3:00 p.m. 2009 is continued until ~~March 10, 2009~~ at _____ .m. The parties shall file a joint case management conference statement 7 calendar days in advance of the case management conference.

IT IS SO ORDERED,

Dated: January 9 _____, 2009

Hon. William
United States

